

**UNITED STATES BANKRUPTCY COURT OF APPEALS  
SOUTHERN DISTRICT OF NEW YORK**

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**Adversary Proc. No.: 17-ap-01027-jlg**

In re:

Chapter 13

NEELAM TANEJA,

Debtor,

vs.

Case No.: 16-bk-12356-jlg

THE HEALTH LAW FIRM,

Creditor/Defendant.

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**DEFENDANTS/APPELLEES' OPPOSITION TO PLAINTIFF/APPELLANT'S**

**MOTION FOR EXTENSION OF TIME TO FILE APPEAL**

1. The matter that Plaintiff/Appellant Neelam Taneja, M.D. (A/k/a Neelam Taneja Uppal, M.D.), is appealing is a Final Judgment for sanctions and attorney's fees against her, in part for filing frivolous pleadings, in order to unnecessarily delay the case. (ECF No. 29). Exhibit "1."

2. Plaintiff/Appellant Neelam Taneja Uppal filed a frivolous Adversary Proceeding Complaint in this case against these Defendants/Appellants. (ECF No. 1). It was dismissed by the Bankruptcy Court. (ECF No. 15).

3. The issues involved in the present Adversary Proceeding case are unique to this case and these Defendants/Appellees.

4. The Final Judgment being appealed is unique to this case and these Defendants/Appellees. (ECF No. 29).

5. This case does not involve or depend on issues or facts from the main bankruptcy proceeding.

6. In the main bankruptcy proceeding (Case No. 16-bk-12356) the Bankruptcy Trustee recommended dismissal of the case. (Case No. 16-bk-12356; ECF No. 162). The Bankruptcy Judge entered an Order on the case noting that Plaintiff/Appellant Neelam Taneja Uppal's bankruptcy petition was "a scheme to delay, hinder, or defraud creditors . . . ." (Case No. 16-bk-12356; ECF No. 163). Exhibit "2."

7. Plaintiff/Appellant Neelam Taneja Uppal is merely seeking, once again, to delay and obstruct any finalty in this matter.

WHEREFORE, Defendants/Appellees request this Court Dismiss Plaintiff/Appellant's Motion for Extension of Time to File Appeal.

### **CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that I have electronically filed the foregoing with the Clerk of Court using the CM/ECF System, which will automatically serve each party that is a registered CM/ECF user for this adversary proceeding; I have also served a copy of this on Debtor Neelam Taneja Uppal (pro se) her via e-mail address: nneelu123@aol.com; I have also served a copy of this on Debtor Neelam Taneja Uppal (pro se) by mailing it via U.S. mail, postage prepaid to her at the following addresses:

- 1) 1370 Broadway #504, New York, New York 10018;
- 2) 17715 Gulf Boulevard, #705, Reddington Shores, Florida 33782; and
- 3) Post Office Box 1002, Largo, Florida 33779;

I further certify that I have also served a copy of the foregoing via U.S. mail, postage prepaid, to the following: Bankruptcy Trustee Jeffrey L. Sapir, Esquire/Jody L. Kava, Esquire, at 399

Knollwood Road, Suite 102, White Plains, New York 10603, and electronically at [info@sapirch13tr.com](mailto:info@sapirch13tr.com); on this 4th day of August 2017.

/s/ George F. Indest

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**GEORGE F. INDEST III, J.D., M.P.A., LL.M.**

Florida Bar No.: 382426

(Admitted Pro Hac Vice)

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**ATTORNEYS FOR CREDITOR/DEFENDANT,  
THE HEALTH LAW FIRM, P.A.**

cc: Judge Cecelia Morris

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Exhibits